

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
:
UNITED STATES OF AMERICA :
:
-v.- :
:
ANNA JURAVLEVA, :
:
Defendant. :
:
- - - - - x

SEALED
INFORMATION

20 Cr.

20 CRIM 679

COUNT ONE

**(Conspiracy to Commit Mail Fraud, Wire Fraud,
and Health Care Fraud)**

The Acting United States Attorney alleges:

1. From at least in or about 2010, up to and including in or about January 2019, in the Southern District of New York and elsewhere, ANNA JURAVLEVA, the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit mail fraud, in violation of Title 18, United States Code, Section 1341, wire fraud, in violation of Title 18, United States Code, Section 1343, and health care fraud, in violation of Title 18, United States Code, Section 1347.

2. It was a part and object of the conspiracy that ANNA JURAVLEVA, the defendant, and others known and unknown, together with others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud,

and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice, would and did place in a post office and authorized depositories for mail matter, matters and things to be sent and delivered by the Postal Service, and would and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and would and did take and receive therefrom, such matters and things, and would and did cause to be delivered by mail and such carriers according to directions thereon, and at the places at which they were directed to be delivered by the person to whom they were addressed, such matters and things, in violation of Title 18, United States Code, Section 1341.

3. It was further a part and object of the conspiracy that ANNA JURAVLEVA, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such

scheme and artifice, in violation of Title 18, United States Code, Section 1343.

4. It was further part and object of the conspiracy that ANNA JURAVLEVA, the defendant, and others known and unknown, knowingly and willfully, would and did execute and attempt to execute, a scheme or artifice to defraud a health care benefit program and to obtain by means of false or fraudulent pretenses, representations, and promises, money or property under the custody or control of a health care benefit program in connection with the delivery of and payment for health care benefits, items and services, in violation of Title 18, United States Code, Section 1347.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Mail Fraud)

The Acting United States Attorney further alleges:

5. From at least in or about 2010, up to and including in or about January 2019, in the Southern District of New York and elsewhere, ANNA JURAVLEVA, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the

purpose of executing such scheme and artifice and attempting so to do, did place and cause to be placed in a post office and authorized depositories for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and did take and receive therefrom, such matters and things, and did cause to be delivered by mail and such carriers according to the directions thereon, and at the places at which they were directed to be delivered by the person to whom they were addressed, such matters and things, to wit, JURAVLEVA, participated in a scheme to defraud Medicaid and health care benefit programs through the submission of false and fictitious claims for services that were not actually rendered, which scheme involved the transmission of, through commercial interstate carriers, among other things, checks issued by a managed long-term care agency located in the Bronx, New York.

(Title 18, United States Code, Sections 1341 and 2.)

COUNT THREE

(Wire Fraud)

The Acting United States Attorney further alleges:

6. From at least in or about 2010, up to and including in or about January 2019, in the Southern District of New York and

elsewhere, ANNA JURAVLEVA, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, JURAVLEVA, and others known and unknown, participated in a scheme to defraud Medicaid and health care benefit programs through the submission of false and fictitious claims for services that were not actually rendered, which scheme involved interstate bank wires, emails, and telephone calls, including the electronic transmission of payment information associated with fraudulent claims from a health care payment processor in Florida to a managed long-term care agency located in the Bronx, New York.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT FOUR

(Healthcare Fraud)

The Acting United States Attorney further alleges:

7. From at least in or about 2010, up to and including in or about January 2019, in the Southern District of New York and

elsewhere, ANNA JURAVLEVA, the defendant, knowingly and willfully did execute and attempt to execute a scheme or artifice to defraud a health care benefit program, as that term is defined in Title 18, United States Code, Section 24(b), and to obtain, by means of false or fraudulent pretenses, representations, and promises, money or property under the custody or control of a health care benefit program, in connection with the delivery of and payment for health care benefits, items and services, to wit, JURAVLEVA, participated in a scheme to defraud Medicaid and health care benefit programs through the submission of false and fictitious claims for services that were not actually rendered including the submission of fraudulent claims to a managed long-term care agency located in the Bronx, New York.

(Title 18, United States Code, Sections 1347 and 2.)

COUNT FIVE

(Conspiracy to Violate the Anti-Kickback Statute)

The Acting United States Attorney further alleges:

8. From at least in or 2010, up to and including in or about January 2019, in the Southern District of New York and elsewhere, ANNA JURAVLEVA, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against

the United States, to wit, to violate Title 42, United States Code, Section 1320a-7b(b)(1)(B), (b)(2)(A), and (b)(2)(B).

9. It was a part and object of the conspiracy that ANNA JURAVLEVA, the defendant, and others known and unknown, willfully and knowingly would and did solicit and receive remuneration (including kickbacks, bribes, and rebates), directly and indirectly, overtly and covertly, in cash and in kind, in return for purchasing, leasing, ordering, and arranging for and recommending purchasing, leasing, and ordering a good, facility, service, and item for which payment may be made in whole and in part under a Federal health care program, in violation of Title 42, United States Code, Section 1320a-7b(b)(1)(B).

10. It was further a part and object of the conspiracy that ANNA JURAVLEVA, the defendant, and others known and unknown, willfully and knowingly would and did offer and pay remuneration (including kickbacks, bribes, and rebates), directly and indirectly, overtly and covertly, in cash and in kind, in return for furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part under a

Federal health care program, in violation of Title 42, United States Code, Section 1320a-7b(b)(2)(A).

11. It was further a part and object of the conspiracy that ANNA JURAVLEVA, the defendant, and others known and unknown, willfully and knowingly would and did offer and pay remuneration (including kickbacks, bribes, and rebates), directly and indirectly, overtly and covertly, in cash and in kind, in return for purchasing, leasing, ordering, and arranging for and recommending purchasing, leasing, and ordering any good, facility, service, and item for which payment may be made in whole or in part under a Federal health care program, in violation of Title 42, United States Code, Section 1320a-7b(b)(1)(B).

Overt Act

12. In furtherance of the conspiracy alleged in Count Five of this Information, and to effect the illegal objects thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In or about December 2018, ANNA JURAVLEVA, the defendant, paid a purported patient approximately \$1,000 in cash to induce that person to purchase home health aide services for which payment may be made in whole or in part under a federal health care program.

(Title 18, United States Code, Section 371.)

COUNT SIX

(Aggravated Identity Theft)

The Acting United States Attorney further alleges:

13. From at least in or about 2010, up to and including at least in or about January 2019, in the Southern District of New York and elsewhere, ANNA JURAVLEVA, the defendant, and others known and unknown, willfully and knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), and aided and abetted the same, to wit, JURAVLEVA forged patient signatures on home health aide timesheets to initiate the submission of fraudulent billings to health care benefit programs during and in relation to the offenses charged in Counts One, Two, and Three of this Information.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b) and 2.)

FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH FIVE

14. As a result of committing the offenses alleged in Counts One through Five of this Information, ANNA JURAVLEVA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1), 982(a)(7), and Title 28

United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendant personally obtained.

Substitute Assets Provision

15. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

Audrey Strauss
AUDREY STRAUSS
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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ANNA JURAVLEVA,

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(18 U.S.C. §§ 371, 1028A, 1341, 1343,
1347, 1349, and 2.)

AUDREY STRAUSS
Acting United States
Attorney.